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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JACOB SMITH,)	Case No. 2:20-cv-03755
)	
Plaintiff,)	
)	Judge Edmund A. Sargus
v.)	Magistrate Judge Kimberly A. Jolson
)	
FIRSTENERGY CORP., <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

JAMES BULDAS,)	Case No. 2:20-cv-03987
)	
Plaintiff,)	Judge Edmund A. Sargus
)	Magistrate Judge Kimberly A. Jolson
v.)	
)	
FIRSTENERGY CORP., <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

BRIAN HUDOCK and CAMEO COUNTERTOPS, INC.,)	Case No. 2:20-cv-03954
)	
Plaintiffs,)	Judge Edmund A. Sargus
)	Magistrate Judge Kimberly A. Jolson
v.)	
)	
FIRSTENERGY CORP., <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**DECLARATION OF VINCE A. SHEHEEN IN SUPPORT OF AWARD OF
ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES, AND AWARD OF
INCENTIVE PAYMENTS TO CLASS REPRESENTATIVES**

I, Vincent A. Sheheen declare as follows:

1. I am an attorney licensed to practice before the courts of South Carolina, the United States District Court for the District of South Carolina, and the United States Fourth Circuit Court of Appeals, and am a partner in the law firm Savage, Royall, and Sheheen LLP (“Savage Firm”). I have personal knowledge of the facts stated in this Declaration and, if called as a witness, I would testify competently to them. I make this Declaration in support of the Savage Firm’s request for attorneys’ fees and reimbursement of litigation expenses, as set forth in Class Plaintiffs’ Unopposed Motion For Award of Attorneys’ Fees, Costs, and Incentive Awards To Class Representative Plaintiffs (the “Fee Motion”) (ECF No. 145).

2. I am counsel of record for Plaintiff Michael Emmons in a class action lawsuit pending in the Cuyahoga County Court of Common Pleas styled *Emmons v. FirstEnergy Corp.*, Case No. CV-20 935557.

3. A brief description my firm, which includes a short summary of my experience and credentials, is attached as Exhibit 1 and incorporated herein by reference.

4. Throughout the course of this litigation, my firm documented the time spent, including tasks performed, and expenses incurred, and shared those reports with James L. Ward, Jr., who is Class Counsel for the Settlement Class along with Dennis E. Murray, Jr. and Marvin A. Miller. *See* ECF No. 142 (preliminary approval order appointing Messrs. Murray, Miller, and Ward as Class Counsel). All the time and expenses reported by my firm advanced the tremendous class-wide result achieved in this case.

5. Such work included leading settlement negotiations in the Emmons case and leading the liaison discussions between the Emmons counsel and the Smith counsel. The Savage Firm was deeply involved in creating the settlement strategy, leading negotiations, creating litigation strategy, and managing case progress. The Savage Firm also reviewed and assisted in motions, pleadings,

research, and briefings.

6. The schedule attached as Exhibit 2, and incorporated herein, is a summary of the amount of time spent by my firm's partners, attorneys, and professional support staff who were involved in this litigation. It does not include any time devoted to preparing this Declaration or otherwise pertaining to the Fee Motion. The lodestar calculation is based on my firm's billing rates in effect at the time services were performed. Exhibit 2 was prepared from contemporaneous time records regularly prepared and maintained by my firm. Those records have been provided to Class Counsel, and I authorize them to be submitted for inspection by the Court if necessary. The hourly rates for my firm's partners, attorneys, and professional support staff included in Exhibit 2 were, at the time the work was performed, the usual and customary hourly rates charged for their services in similar complex litigation.

7. The total number of hours reasonably expended on this litigation by my firm from inception through July 31, 2022, which does not include time spent preparing this Declaration or preparing the Fee Motion, is 658.25 hours. The total lodestar for my firm is \$490,143.75. Expense items are billed separately and are not duplicated in my firm's lodestar.

8. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, invoices, receipts, check records, and other source materials and accurately reflect the expenses incurred. My firm's expense records are available for inspection by the Court if necessary.

9. My firm incurred a total of \$5680.38 in unreimbursed expenses, all of which were reasonable and necessary for the prosecution of this litigation. This amount was for non-common litigation expenses incurred by my firm, such as travel, meal, and lodging, copying, legal research, and telephone. A summary of these expenses by category is attached as Exhibit 3.

10. In the event my firm provides additional services or incurs additional costs, I will

supplement this declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of October 2022, in Camden, South Carolina.

s/ Vincent A. Sheheen

Vincent A. Sheheen

SAVAGE ROYALL AND SHEHEEN, LLP
EXHIBIT ONE

The law firm of Savage Royall and Sheheen, LLP has been in existence for almost 100 years. During that time, the firm has handled thousands of cases of many varieties in numerous courts.

Vincent A. Sheheen has been a member of the South Carolina and federal bars since 1996. He has wide experience in complex litigation, including business, personal injury and class action cases on both the Plaintiff and Defense sides. He has appeared in state and federal trial and appellate courts, has tried numerous cases, and is a member of the Inn of Court and American Board of Trial Advocates. Mr. Sheheen has served in the South Carolina House of Representatives and the South Carolina Senate and is a member of numerous local, state, and national civic groups. Mr. Sheheen has obtained multi-million dollar settlements and verdicts as lead counsel.

In the current matter, Mr. Sheheen led settlement negotiations in the Emmons case and led the liaison discussions between the Emmons counsel and the Smith counsel. Mr. Sheheen was deeply involved in creating the settlement strategy, leading negotiations, creating litigation strategy, and managing case progress. Mr. Sheheen also reviewed and assisted in motions, pleadings, and briefings. Mr. Sheheen reviewed discovery, research and other relevant materials.

Michael D. Wright has been a member of the South Carolina and federal bar since 2009. Mr. Wright is a trial attorney who has a sprawling and diverse practice, representing clients in municipal, state, and federal courts at both the trial and appellate level. Mr. Wright represents both individuals and businesses in civil litigation, business disputes, employment disputes, and criminal matters and has also helped individuals in the formation of companies and has aided businesses, physicians, and other professional practices with asset purchases, mergers, and acquisitions. In addition to his work at the firm, Mr. Wright serves as the Chief Judge of the City of Camden

Municipal Court, having previously served as the prosecutor for the City of Camden. Mr. Wright has served on the executive committees of the Camden Rotary Club, the United States Junior Chamber of Commerce, and the United Way of Kershaw County.

With respect to the current matter, Mr. Wright poured through legislative documents and hearing testimony regarding the enactment of HB6, drafted pleadings and memorandums in opposition to various motions, assisted in the coordination and review of discovery, and performed the necessary legal research to assist in the litigation strategy in this case.

SAVAGE ROYALL AND SHEHEEN, LLP
EXHIBIT TWO

Name	Hourly Rate	Total Hours	Total Amount
Michael Wright	\$575.00	308.25	\$177,243.75
Vincent Sheheen	\$894.00	350	\$312,900.00
			\$490,143.75

EXHIBIT 3

Savage, Royall & Sheheen, LLP Proprietary And Confidential

**Savage, Royall & Sheheen, LLP
Time/Expense**

Matter	Date	Timekeeper	Task/Exp	Description	Value
030690-EMMONS VS. FIRST ENERGY	01/03/2022	Michael D. Wright	Client Disbursements Other	Reimburse for Flight, Luggage and Parking	755.31
030690-EMMONS VS. FIRST ENERGY	12/21/2021	Vincent A. Sheheen	Travel Gas & Mileage	Cab Fare	40.00
030690-EMMONS VS. FIRST ENERGY	12/21/2021	Vincent A. Sheheen	mileage reimbursement	140 miles driven	78.40
030690-EMMONS VS. FIRST ENERGY	12/16/2021	Vincent A. Sheheen	Pro Hac Vice renewal	Pro Hac Vice renewal for VAS	300.00
030690-EMMONS VS. FIRST ENERGY	12/16/2021	Michael D. Wright	Pro Hac Vice renewal	PHV renewal fee charged to credit card 12.16.21	300.00
030690-EMMONS VS. FIRST ENERGY	09/15/2021	Vincent A. Sheheen	Travel Expense	Travel Expenses	1,863.12
030690-EMMONS VS. FIRST ENERGY	08/02/2021	Vincent A. Sheheen	Travel Gas & Mileage	Reimburse for flight and mileage to and from Charlotte airport.	785.30
030690-EMMONS VS. FIRST ENERGY	07/28/2021	Michael D. Wright	Meals	Flannery's Pub	120.00
030690-EMMONS VS. FIRST ENERGY	07/28/2021	Vincent A. Sheheen	Mileage	Mileage	100.50
030690-EMMONS VS. FIRST ENERGY	07/26/2021	Vincent A. Sheheen	Travel Gas & Mileage	Taxi in Ohio	43.20
030690-EMMONS VS. FIRST ENERGY	07/02/2021	Vincent A. Sheheen	Travel Gas & Mileage	Change in Flight price difference	65.02
030690-EMMONS VS. FIRST ENERGY	07/01/2021	Vincent A. Sheheen	Travel	Additional cost for flight change	50.24
030690-EMMONS VS. FIRST ENERGY	06/29/2021	Vincent A. Sheheen	Travel Airfare	Round trip airfare from Charlotte to Detroit.	495.29
030690-EMMONS VS. FIRST ENERGY	06/22/2021	Vincent A. Sheheen	Travel Gas & Mileage	Mileage	84.00
030690-EMMONS VS. FIRST ENERGY	08/07/2020	Michael D. Wright		ProhacVice Registration Certificate	300.00
030690-EMMONS VS. FIRST ENERGY	08/07/2020	Vincent A. Sheheen		ProhacVice Registration Certificate	300.00
					5,680.38